

Green, LindaE

From: Jorja Rose <jorjarose@bennington.edu>
Sent: Thursday, January 05, 2017 10:21 AM
To: FOIA HQ
Cc: Mariah Blake
Subject: Public Records Request

FOIA REQUEST

Fee benefit requested

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request documents and exhibits introduced by the EPA as evidence during the complainant's initial prehearing exchange in the matter of E.I. DuPont de Nemours and Company (docket numbers TSCA-HQ-2004-0016, RCRA-HQ-2004-0016, and TSCA-HQ-2005). My request is for all of the exhibits relating to DuPont's understanding of substantial risk. A list of those exhibits can be found here:

<https://www.epa.gov/sites/production/files/2016-05/documents/dupont-prehearingexchange.pdf>

I would also like copies of the following respondent depositions. For your convenience, I have included the exhibit numbers listed in the document I linked to above.

- 113 – Transcript of the videotaped deposition of Bruce W. Karrh, M.D., dated April 15, 2004, in the matter of Jack W. Leach, et al. v. E.I. DuPont De Nemours & Company (80 pp.)
- 114 – Deposition of Gerald Kennedy, Volume I and Index (339 pp.)
- 115 – Exhibits 1-24 to the deposition of Gerald Kennedy, dated July 31, 2002.
- 116 – Deposition and exhibits of Gerald Kennedy, dated August 1, 2002. Volume II, attached exhibits 25-84
- 118 – Transcript of videotaped deposition of Glenn R. Evers, dated April 30, 2004 (267 pp.)
- 119 – Deposition of Paul Bossert, dated January 16, 2001 (94 pp.)
- 122 – Deposition of Andrew Gallagher, dated May 17, 2004, and attachments as exhibits (54 pp.)
- 123 – Deposition of Judy Walrath, Ph.D., dated June 24, 2004. In the matter of Leach v. DuPont (100 pp.)
- 150 – DVD of the videotaped deposition of Glenn Evers, dated April 30, 2004, Part 1 of 3

I would like to receive the information in the form of digital PDFs if possible, except for exhibit 150, which I would like to receive in the form of a DVD or digital video file.

As a representative of the news media I am only required to pay for the direct cost of duplication after the first 100 pages. As research assistant to Mariah Blake, an investigative journalist working on a book for Crown that is intended to educate the public on government operations, I request a fee waiver.

I would appreciate your communicating with me by email or telephone, rather than by mail.

I look forward to your determination regarding my request within 20 business days, as the statute requires.

Thank you for your assistance.

Sincerely,

Jorja Rose
Research Assistant to Mariah Blake
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Washington, D.C. 20010
(405) 326-4033